

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	CRIMINAL NO. 04-10378-GAO
v.	)	
	)	
ROSS ELLIOTT	)	
	)	
	)	

**JOINT INTERIM STATUS CONFERENCE MEMORANDUM**

The United States of America, by Assistant U.S. Attorney Ann Taylor, and the defendant Ross Elliott, by counsel John Palmer, Esq., jointly submit this memorandum in anticipation of the Interim Status Conference scheduled for March 22, 2005.

1. The parties have been discussing various discovery issues, including the possibility of filing a joint motion for entry of a protective order relating to production of the hard drive of the computer at issue in this case, which contains child pornography.

2. Previously, the defendants discovery motions were due on March 23, 2005. In light of the ongoing discussions, as well as the large volume of discovery in this case, the defendant requests an additional thirty days in which to file discovery letters, until April 21, 2005. The defendant also requests three weeks thereafter to file discovery motions, until May 12, 2005 (which time period allows the government two weeks to respond to the discovery letters and one week for defendant to prepare

motions).

3. The parties request that an Interim Status Conference be scheduled for mid-May, 2005.

4. The parties request that the time period between March 22, 2005 and the date of the Second Interim Status Conference be excluded from calculation under the Speedy Trial Act, due to ongoing discovery.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Ann Taylor/DTS  
Ann Taylor  
Assistant U.S. Attorney

ROSS ELLIOTT  
Defendant

By: /s/ John Palmer/DTS  
John Palmer  
Counsel for Ross Elliott

DATE: March 21, 2005